



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 14, 1997

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Greg B. Lam. Esq.
Copilevitz & Canter
423 W. Eighth Street
Suite 400
Kansas City, Missouri 64105

RE: MUR 3774

Dear Mr. Lam:


We are in receipt of your clients' response dated March 13, 1997 to the Commission's Subpoena and Order. Upon review, it appears that several of the responses submitted require clarification or additional information. Specifically, please note that the term "Southern Education Counsel" as used in the Subpoena and Order refers to both the Southern Education Counsel, Inc. and the Southern Education Counsel Capital Corporation, all parent and related corporations and entities, including but not limited to Civic Development Group, Inc., Southern Education Counsel II, L.L.C., Public Awareness Group, Inc. and Southern Education Fund, Inc., and all officers, employees, agents, volunteers or attorneys thereof. Accordingly, please now clarify whether your initial response encompassed each covered entity. If not, now provide separately as to each covered entity responses to all interrogatories and document requests accompanying the Commission's Subpoena and Order.

As concerns your clients' responses to interrogatories four through seven, we cannot agree with the narrowing characterization of the communications at issue as "solicitations." Interrogatories four through seven seek information concerning all calls by each of the above covered entities concerning, regarding or otherwise referring to the 1994 United States Senate election in Minnesota, the candidates Rod Grams and Ann Wynn or "abortion rights" issues. Accordingly, please now respond to interrogatories four through seven consistent with the above.

Further, as concerns you clients' answer to interrogatory six, and in accordance with the instructions to the Subpoena and Order, please identify each person contacted in responding to this interrogatory, by stating each person's full name, most recent business and residence addresses, telephone numbers, and occupation and employer. To the extent that additional persons are contacted in responding to any requests in this letter, please also provide the same information as to these persons.

Last, please note that the Commission requires that all responses to its Subpoena and Orders be submitted under oath. Accordingly, we request that your clients submit responses to these discovery requests under oath within fifteen days of the receipt of this letter. Should you have any questions, please contact me at (202) 219-3690.

Sincerely,


Jose M. Rodriguez
Attorney